

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
McMANIMON, SCOTLAND & BAUMANN, LLC 75 Livingston Avenue, Suite 201 Roseland, New Jersey 07068 (973) 622-1800 Anthony Sodono, III (asodono@msbnj.com) Sari B. Placona (splacona@msbnj.com) <i>Counsel for Daryl Fred Heller, the Chapter 11 Debtor and Debtor-in-Possession</i>	
In re:	Case No. 25-11354 (JNP)
DARYL FRED HELLER,	Chapter 11
Debtor.	Honorable Jerrold N. Poslusny, Jr.,

ADJOURNMENT REQUEST

1. I, Sari B. Placona, Esq.,

☒ am the attorney for Daryl Fred Heller, Debtor in the above-referenced proceeding, and request an adjournment of the following hearing for the reason set forth below.

Matter: Hearing on Order To Show Cause regarding the appointment of a Chapter 11 Trustee [Doc. No. 520]

Current hearing date and time: October 15, 2025 at 10:00 a.m.

New date requested: October 22, 2025 at 10:00 a.m.

Reasons for adjournment request: I serve on the executive board of TMA Global and will be attending the TMA Annual Conference in New Orleans on October 15, 2025. Ms. Sorvino is on the Board of Trustees for TMA Global and will also be attending the TMA Annual Conference on October 25, 2025. While Mr. Sodono is available, this is a large case with numerous issues and parties which we work together on.

2. Consent to adjournment:

☐ I have the consent of all parties. ☐ I do not have the consent of all
I emailed chambers copying the parties and Mr. Ciardi was the only person who responded that his partner can cover.

I hereby certify under penalty of perjury that the foregoing is true.

Date: August 28, 2025

/s/ Sari B. Placona
Sari B. Placona

COURT USE ONLY

The request for adjournment is:

- ☒ Granted New hearing date: 10/22/2025 at 10am ☐ Peremptory
- ☐ Granted over objection(s) New hearing date: _____ ☐ Peremptory
- ☐ Denied

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.